



FASULO, SHALLEY & DiMAGGIO
ATTORNEYS AT LAW

LOUIS V. FASULO *
MARGARET M. SHALLEY
CHARLES DiMAGGIO
* ADMITTED NJ

OF COUNSEL
DOUGLAS KAHAN

August 15, 2007

via facsimile (212) 805-7917
UNITED STATES DISTRICT COURT, SDNY
Hon. Robert P. Patterson, USDJ
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v Hector Figueroa
Docket No.: 07 Cr 587 (RPP)

Dear Honorable Sir:

I was recently appointed to represent the Defendant in the above-referenced matter, pursuant to CJA. Please accept this correspondence as a request to extend the deadline to file motions for two (2) weeks.

As the Court is aware, the deadlines set for motions was today. However, Counsel attempted to review discovery with the defendant but encountered technical difficulty and was unable to play the tapes. As a result, it is respectfully requested that the deadline for Defense Counsel to submit any motions be extended two (2) weeks, until August 29, 2007, as it meets the interests of justice.

It should be noted that my office attempted to reach AUSA Jessica Masella, but was unable to reach her prior to the submission of this request.

USDC SDNY
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Respectfully submitted,

Louis V. Fasulo

*O'Konski granted
so ordered
Fasulo RPP 8/16/07*

cc:

Jessica Masella, AUSA
via facsimile (212) 637-0084